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December 13, 2017

BY ECF ONLY

The Honorable Carol Bagley Amon United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

Re: Derrick Hamilton v. City of New York, et al., 1:15 CV 04574 (CBA)(VMS)

Dear Judge Amon:

As Your Honor may recall, I represent the City of New Haven and certain individual defendants in the captioned litigation. There is a pre-motion conference on these defendants' anticipated motion for summary judgment scheduled for December 21, 2017 at 3:00 p.m. This is to request an adjournment of that conference.

On December 21, 2017, undersigned counsel has a previously scheduled commitment. In addition, as of this filing, no other party has filed a request for a pre-motion conference. It is the undersigned's understanding that additional pre-motions requests will be filed within the existing deadline. Accordingly, the undersigned requests that the December 21, 2017 pre-motion conference be adjourned until January 22, 25 or 26, 2018, on which dates counsel for all parties are available. Hearing all of the requests at the same conference will provide for a uniform briefing schedule for dispositive motions, reduce duplicative proceedings and result in a net gain of judicial resources.

Plaintiff's counsel, Jonathan Edelstein, Esquire, and counsel for all co-defendants have consented to the requested adjournment. This is the first request for such adjournment, and, if granted, it will not otherwise disturb the schedule for this case.

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Wherefore, the New Haven defendants hereby respectfully request an adjournment of the December 21, 2017 pre-motion conference until January 22, 25 or 26, 2018.

The Court's consideration of this request is greatly appreciated.

Respectfully submitted,

/SS/Dennis M. Durao

Dennis M. Durao

DMD/amf

cc: All counsel of record VIA ECF